

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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CANDICE MCGOWAN GRIMSLEY AND ROBERT
GRIMSLEY,

Plaintiff,

-against-

NATIONS RECOVERY CENTER, INC.,

Defendant(s).

-----x

ANSWER

08 CV 5905
(MGC)

Defendant, NATIONS RECOVERY CENTER, INC., by its attorney
MEL S. HARRIS AND ASSOCIATES, LLC, answers plaintiff's complaint as
follows:

1. The defendant admits being sued pursuant to the Fair Debt Collection Practices Act, but denies any violation thereof.
2. Defendant denies knowledge or information sufficient to form a belief as to each and every allegation contained in paragraph "2" of the complaint.
3. Defendant denies knowledge or information sufficient to form a belief as to each and every allegation contained in paragraph "3" of the complaint.
4. Defendant admits the allegations contained in paragraph "4" of the complaint.

5. Defendant admits the allegations contained in paragraph "5" of the complaint.

6. Defendant admits the allegations contained in paragraph "6" of the complaint.

7. Defendant admits that the Court has jurisdiction over this matter, but denies that venue is proper.

8. Defendant denies knowledge or information sufficient to form a belief as to each and every allegation contained in paragraph "8" of the complaint.

9. Defendant denies knowledge or information sufficient to form a belief as to each and every allegation contained in paragraph "9" of the complaint.

10. Defendant admits the allegations contained in paragraph "10" of the complaint.

11. Defendant admits the allegations contained in paragraph "11" of the complaint.

12. Defendant admits that its representative contacted plaintiffs, but otherwise denies the allegations contained in paragraph "12" of the complaint.

13. Defendant denies knowledge or information sufficient to form a belief as to each and every allegation contained in paragraph "13" of the complaint.

14. Defendant denies each and every allegation contained in paragraph "14" of the complaint.

15. Defendant denies each and every allegation contained in paragraph "15" of the complaint.

16. Defendant denies each and every allegation contained in paragraph "16" of the complaint.

17. Defendant denies each and every allegation contained in paragraph "17" of the complaint.

18. Defendant denies knowledge or information sufficient to form a belief as to each and every allegation contained in paragraph "18" of the complaint.

19. Defendant denies each and every allegation contained in paragraph "19" of the complaint.

20. Defendant denies each and every allegation contained in paragraph "20" of the complaint.

21. Defendant denies each and every allegation contained in paragraph "21" of the complaint.

22. Defendant denies each and every allegation contained in paragraph "22" of the complaint.

23. Defendant denies each and every allegation contained in paragraph "23" of the complaint.

24. Defendant denies each and every allegation contained in paragraph "24" of the complaint.

25. Defendant denies each and every allegation contained in paragraph "25" of the complaint.

26. Defendant denies each and every allegation contained in paragraph "26" of the complaint.

27. Defendant denies each and every allegation contained in paragraph "27" of the complaint.

28. Defendant denies each and every allegation contained in paragraph "28" of the complaint.

29. Defendant denies each and every allegation contained in paragraph "29" of the complaint.

30. Defendant denies each and every allegation contained in paragraph "30" of the complaint.

31. Defendant denies each and every allegation contained in paragraph "31" of the complaint.

WHEREFORE, the defendant respectfully requests that plaintiff's complaint be dismissed.

Dated: New York, NY
August 12, 2008



Arthur Sanders (AS-1210)
MEL S. HARRIS AND ASSOCIATES, LLC
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TO:

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